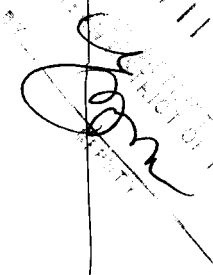


District Court, El Paso County, Texas Court Address: 525 Magoffin Av. El Paso Texas suit 105 79901	<div style="text-align: right;"> <p>FILED 2017 MAY 11 PM 5:33 CLERK OF DISTRICT COURT EL PASO COUNTY TEXAS</p>  </div> <div style="text-align: center;">Court use only</div>
People of the State of The State of Texas, Plaintiff, v. Sanjose Angeles Defendant.	
Attorney or Party Without Attorney (Name and Address) Appearing pro se: Sanjose Angeles#171862 SCF/Unit 25 P.O. Box 6000 Sterling, CO 80751	Case No: EP-10-CR-1567-FM A01300460 Div: Ctrm:
MOTION FOR DISMISSAL OF CHARGES	

COMES NOW, the Defendant, Sanjose Angeles, pro se, and respectfully moves this Court to dismiss the pending charges in the above matter, and as grounds states the following:

1. A detainer was lodged by El Paso County, State of Texas, for violation of Probation.
2. Defendant requested a speedy disposition pursuant to C.R.S. 24-60-501 et seq., on or about August 5, 2016. To date, no action has been taken against the Defendant under the provision of the Interstate Agreement on Detainers Act.
3. C.R.S. 24-60-501, et seq., requires dismissal of charges against the Defendant if Prosecuting officials fail to respond to a request for speedy disposition within 180 days of receipt of the request. Further, "A defendant is entitled to the dismissal of charges against him that underlie a detainer as a sanction for violation of the prompt notification requirement of § 16-14-102 (2) of the uniform act..."
4. The I.A.D. and the UMDDA EMBODY LIKE POLICIES, and generally, the principals of one may be applied to the other. See People v. Morgan, 712 P.2d 1004 (Colo. 1986); Sweany v. District Court, 713 P.2d 914 (Colo. 1986).
5. The unlawful detainer against the Defendant is preventing Mr. Angeles from progressing in his efforts for rehabilitative

WHEREFORE, the Defendant prays that this Court will dismiss with prejudice the charges against the Defendant in this case.

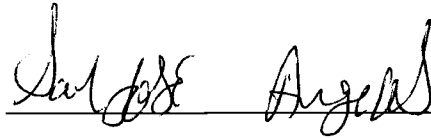
Respectfully submitted this 5th day of May, 2017.



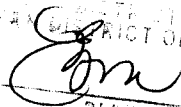
Certificate of Mailing

I, Sanjose Angeles, do hereby certify that a true and correct copy of the foregoing **Motion for Dismissal of Charges** was placed in the U. S. Mail, postage prepaid, to the following address, on this 5th of May, 2017.

District Attorney
of El Paso County Texas
525 Magoffin Av., Ste 105
El Paso, Texas 79901



Date 8-5-16
From: Sanjose Angeles
Register: 171862
Facility: sterling
Unit: 25

FILED
2017 MAY 11 PM 5:34
CLERK OF DISTRICT COURT
DISTRICT OF TEXAS
BY 
CLERK

To: Warden Chapdelaine, John
Case Manager Mr. Harms
P.O. Box 6000
Sterling, Colorado 80750

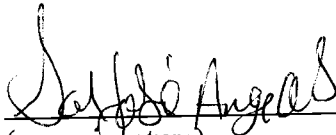
Attention Warden and Case Manager, Court and Prosecuting Official;

Please be advised that I, Sanjose Angeles, #171862 do hereby give notice to you, my facility Warden and Case Manager, or another person equivalent in administrative duties, or designated by you, to file the appropriate documents with the below court and to the proper prosecuting authorities for the respective state and county as set forth in the Interstate Agreement on Detainers Act, 24-60-501, of the Colorado Revised Statutes.

Upon receipt of a Section 24-60-501 request, the duty devolves upon the superintendent to forward a copy of the request via registered mail to the proper court and prosecuting official as indicated in the request. This constitutes my formal demand for final and speedy disposition of charges under the Uniform Mandatory Disposition of Detainers Act.

County: El paso
State: Texas
Case No.: A01300460

I verify that on 8/5/16, I deposited this demand for disposition of outstanding charges in the facility mail in an envelope addressed to Warden John, Chapdelaine, and that a copy of this demand was delivered to mr, Harms, my Case Manager.


(your signature)

Colorado Department Of Corrections

Name Sandoval Angeles

Register Number 171862

Unit 25

Box Number 6600

City, State, Zip Sterling Colorado 80751

DENVER CO 802

06 MAY 2017 PM 2 L



District Attorney
525 Magoffin Av. Suite 185
El Paso Texas 79901

79901-257830

